

EXHIBIT A-5

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1 Q. Go ahead.

2 A. A cast vote record is the one thing we can get
3 under the Freedom of Information Act, and I got
4 one-third of the United States before they deleted stuff
5 on September 3rd of 2022.6 I reached out to every county. But LA
7 County, I really wanted bad because that was your only
8 county, and we got that for both 2020 and 2022, and it
9 was the biggest deep dive you've ever seen. And we also
10 have China tied into that, too, so --

11 Q. Okay. Okay, sir.

12 A. -- it's very...

13 MS. WRIGLEY: I'm just going to move to
14 strike as nonresponsive.

15 THE WITNESS: Yeah.

16 Q. (BY MS. WRIGLEY) I'm going to show you a
17 couple more clips related to "Absolute Proof" playing on
18 OAN. These are clips from what I believe is
19 February 11th where you appeared with Steve Bannon
20 talking about a screening of "Absolute Proof."21 I've got two clips. One of them is going
22 to be marked as Exhibit 601.

23 (Exhibit 601 marked.)

24 Q. (BY MS. WRIGLEY) I'm going to have my
25 colleague play 601. And then Julie -- after it's over,

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1 I'll have her play the second clip. It's from the same
 2 appearance, it's just a different clip. They're both a
 3 couple minutes. And that will be marked Exhibit 602.

4 (Exhibit 602 marked.)

5 (Clip of Steve Bannon and Mike Lindell.)

6 STEVE BANNON: To start this film off, what
 7 people want to know, are you going to back down one
 8 inch --

9 MR. LINDELL: Never. Absolutely never.

10 This isn't about --

11 Q. (BY MS. WRIGLEY) Mr. Lindell --

12 (Clip continues.)

13 MR. LINDELL: -- I don't care if you're a
 14 Democrat or Republican. This was an attack on our
 15 country. These Dominion machines and Smartmatic, these
 16 machines that were -- that are -- that were the -- that
 17 were the tools of this attack, and we will never have
 18 another fair election if we don't -- if we don't stop
 19 them. So I will never back down.

20 (Clip ends.)

21 Q. (BY MS. WRIGLEY) Okay. Before we play the
 22 second clip, Mr. Lindell, I would just ask during this
 23 deposition -- I know you were on your phone texting, but
 24 that's -- unfortunately for you, it's not allowed. I
 25 can't have you communicate while you're on the record --

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1	A. No, I know.	12:47PM
2	Q. -- and testifying with anyone. Particularly, I	12:47PM
3	don't know who you're texting with or communicating,	12:47PM
4	but if --	12:47PM
5	(Crosstalk.)	12:47PM
6	A. It's my company you've tried to destroy, so	12:47PM
7	it's okay.	12:47PM
8	Q. (BY MS. WRIGLEY) Okay. But if you need to	12:47PM
9	take a break at any point in time, we can take a break,	12:47PM
10	but I can't have you communicating --	12:48PM
11	A. Okay.	12:48PM
12	Q. -- with somebody outside of this room when	12:48PM
13	we're on the record, sir.	12:48PM
14	A. Yeah.	12:48PM
15	Q. Do you understand?	12:48PM
16	A. Yeah, I got it.	12:48PM
17	Q. Okay. You didn't -- I'm sorry. You didn't	12:48PM
18	look at me, and I just would ask for a little respect --	12:48PM
19	A. Yeah, I got it.	12:48PM
20	Q. -- a little bit of respect, okay? You	12:48PM
21	understand?	12:48PM
22	A. Yeah.	12:48PM
23	Q. Okay. Were you able to watch the clip, sir?	12:48PM
24	A. Yeah. Yeah, I see the clip.	12:48PM
25	Q. Okay. I'm going to play a second clip. This	12:48PM

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1 is Exhibit 602.

12:48PM

2 A. Okay.

12:48PM

3 (Clip of Steve Bannon and Mike Lindell.)

12:48PM

4 STEVE BANNON: What would you tell the
5 audience? And then how are you going to back up these
6 assertions by Colonel Waldron, the cyber warfare expert?

12:48PM

12:48PM

7 MR. LINDELL: Well, I'll tell you, if
8 you're caught cheating in a poker game, what do you do?
9 Of course, you start lying. And they're all liars
10 there. They're lying. They're boldface lying.

12:48PM

12:48PM

11 I mean, the easier part about it not going
12 online, if you're Dominion or Smartmatic, I mean, that's
13 been proven ten times over. So if you lie a little bit,
14 usually you're lying a lot. And this is all going to
15 come out.

12:48PM

12:48PM

12:48PM

12:48PM

12:48PM

16 When you asked me about that other guy,
17 we -- you know, that remains to be seen. Is he -- does
18 he really -- is he really that naive that he doesn't
19 know what happened, or is he lying? And then you know
20 what? What do you lie for? You usually lie to cover
21 something up.

12:48PM

12:48PM

12:49PM

12:49PM

12:49PM

12:49PM

22 You know, I went out here with everything I
23 have, because I'm a hundred percent, 100 percent that we
24 have all the proof. That's why it's called "Absolute
25 Proof."

12:49PM

12:49PM

12:49PM

12:49PM

12:49PM

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1	(Clip ends.)	12:49PM
2	Q. (BY MS. WRIGLEY) Okay. Mr. Lindell, I have	12:49PM
3	one more clip. This is the third clip from the	12:49PM
4	screening with Mr. Bannon.	12:49PM
5	MS. WRIGLEY: Before I do that, that one	12:49PM
6	will be marked --	12:49PM
7	MS. LOFTUS: 603.	12:49PM
8	MS. WRIGLEY: -- 603.	12:49PM
9	(Exhibit 603 marked.)	12:49PM
10	Q. (BY MS. WRIGLEY) Do you recognize you on that	12:49PM
11	video, sir?	12:49PM
12	A. (Witness indicated by nodding his head	12:49PM
13	affirmatively.)	12:49PM
14	Q. I'm sorry. You have to give an oral response.	12:49PM
15	A. Yes. Yes. I recognize the tie.	12:49PM
16	Q. One more -- one more clip, sir.	12:49PM
17	A. I lost that one.	12:49PM
18	MS. WRIGLEY: Go ahead.	12:49PM
19	(Clip of Steve Bannon and Mike Lindell.)	12:49PM
20	MR. LINDELL: And I -- my -- part of my due	12:49PM
21	diligence -- that's been all this week. I -- I want to	12:49PM
22	go back to where this all started in Venezuela. It all	12:49PM
23	started in Venezuela with Smartmatic, not Dominion and	12:49PM
24	the other one. It was with Smartmatic. And I have --	12:50PM
25	we're going to have the gal -- all this gal -- I'll	12:50PM

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1 put all -- that evidence, I will put up on my
2 michaeljlinnell.com website.

3 (Clip ends.)

4 Q. (BY MS. WRIGLEY) Okay. Do you recall doing
5 appearances or discussions with Mr. Bannon at OAN in
6 connection with "Absolute Proof" being screened on that
7 network?

8 A. Yeah --

9 Q. Okay.

10 A. -- from what I recall. It's three years ago,
11 but yeah.

12 Q. And you recognize that you're --

13 A. Yeah. Yeah.

14 Q. You recognize you're in those clips with
15 Mr. Bannon?

16 A. Yeah. Yeah.

17 Q. And in those clips, you are specifically
18 mentioning Smartmatic machines being part of an attack
19 on the country in connection with the 2020 election,
20 correct?

21 A. It's right there. I talked about Venezuela,
22 and we have a separate investigation on that, so...

23 Q. Okay. But you -- you did mention Smartmatic in
24 connection with the 2020 election?

25 A. Yeah. Yeah. Yeah, I mentioned Smartmatic.

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1	Absolutely.	12:50PM
2	Q. Okay. And you mentioned Smartmatic, along with	12:50PM
3	Dominion, being boldface lying about its machines not --	12:50PM
4	A. A hundred percent saying they're not on the	12:50PM
5	Internet, yes.	12:50PM
6	Q. Okay. And you mentioned that's been a lie on	12:50PM
7	this appearance with Mr. Bannon, correct?	12:50PM
8	A. And he's -- yeah, still lying.	12:51PM
9	Q. And in this appearance promoting "Absolute	12:51PM
10	Proof" with Mr. Bannon, you were tying Smartmatic to	12:51PM
11	election fraud in connection with the 2020 election,	12:51PM
12	right?	12:51PM
13	A. Basically, what I said there, it all started in	12:51PM
14	Venezuela with Smartmatic. By that time, I had also	12:51PM
15	started a whole other investigation. That's what I	12:51PM
16	teased there.	12:51PM
17	Q. Yep. And you're -- you're -- specifically	12:51PM
18	mentioned Venezuela in there, correct?	12:51PM
19	A. Yep.	12:51PM
20	Q. Okay. And in the months after you taped	12:51PM
21	"Absolute Proof" in 2021, did you give additional media	12:51PM
22	appearances in order to specifically talk about	12:51PM
23	Smartmatic in connection with election fraud?	12:51PM
24	A. Nobody would -- nobody would have me on because	12:51PM
25	you guys scared them off.	12:51PM

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1 Q. Okay. Now, you had mentioned that in one of
 2 those clips that it all started in Venezuela with
 3 Smartmatic, correct?

12:51PM
12:51PM
12:51PM

4 A. I said that we had evidence now that it did.
 5 We -- I hired a company, it was like, I don't know, a
 6 couple hundred thousand dollars, and they did a deep
 7 dive into the genesis of all of this, and Smartmatic --
 8 and there was also some -- there was also work that kind
 9 of validated what Sidney Powell had been putting out
 10 that I had heard.

12:51PM
12:51PM
12:51PM
12:51PM
12:52PM
12:52PM
12:52PM
12:52PM

11 But I wanted to find my own due diligence,
 12 and we did our own, and it goes back to Venezuela. I
 13 actually talked to people in Venezuela. The underground
 14 there had them on crying and saying, you know, to -- and
 15 telling us what had happened in Venezuela with their
 16 country being taken over by the machines.

12:52PM
12:52PM
12:52PM
12:52PM
12:52PM
12:52PM
12:52PM

17 Q. Are you aware that Smartmatic blew the whistle
 18 on the government of Venezuela years before the 2020
 19 election, sir?

12:52PM
12:52PM
12:52PM
12:52PM

20 A. Was what?

12:52PM

21 Q. Are you aware --

12:52PM

22 MR. KACHOUROFF: Objection, assumes facts
 23 not in evidence.

12:52PM
12:52PM

24 Q. (BY MS. WRIGLEY) Are you aware that Smartmatic
 25 blew the whistle on the government of Venezuela a number

12:52PM
12:52PM

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1 of years prior to 2020?

12:52PM

2 A. I'm -- I don't know, but -- I'm not aware of
3 that, but I'm sure you had a hidden agenda there, too.

12:52PM

4 Q. And whenever you bring up or in the past when
5 you've brought up Smartmatic in connection with
6 Venezuela, are you mentioning Venezuela for any
7 particular reason, sir?

12:52PM

12:52PM

12:52PM

12:52PM

12:53PM

12 Argentina, one judge made a ruling last
13 year to get rid of the machines, and they had a fair and
14 free election.

12:53PM

18 The Netherlands said how do -- what do we
19 do now that you put these in there?

12:53PM

12:53PM

12:53PM

12:53PM

12:53PM

12:53PM

12:53PM

12:53PM

12:53PM

20 THE COURT REPORTER: Will you slow down,
21 please.

12:53PM

12:53PM

12:53PM

12:53PM

12:53PM

12:53PM

12:53PM

22 A. He said what did you do now that the
23 Netherlands -- the Netherlands asked him, what do we do
24 now that you set this way to cheat with these machines?

12:53PM

12:53PM

12:53PM

12:53PM

12:53PM

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1 nothing you can do. In five months, the Netherlands
 2 switched over to paper ballots hand counted. His name
 3 is Clint Curtis. He's been very vocal. He's a
 4 Democrat. But the Republicans used it against him, and
 5 so he blew the whistle on them like in 2005, 2006.

6 Q. (BY MS. WRIGLEY) Mr. Lindell, do you have a
 7 vendetta against Smartmatic?

8 A. No. All machines, they got to go. We've got
 9 to save our country. I want the American dream. I have
 10 lived the American dream, from going from a crack addict
 11 to where I'm at now with all these employees and stuff,
 12 and that's all I want.

13 I want the -- there's no vendetta. I want
 14 all computers gone in our elections, that's it. You
 15 could call it ES&S, Smartmatic, Hart, Diebold, it
 16 doesn't matter.

17 Q. I'm going to hand -- I've handed to you what's
 18 been marked as Exhibit 604, sir.

19 (Exhibit 604 marked.)

20 Q. (BY MS. WRIGLEY) I'll represent you're not in
 21 this E-mail, but it is produced by the defendants, and
 22 it's from the MyPillow E-mail account. This is DEF
 23 026318.

24 And I'll walk you through this document.
 25 Do you see at the bottom, the first E-mail in this chain

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1	is from a Mona Bagsby --	12:54PM
2	A. Uh-huh.	12:54PM
3	Q. -- at Main Street Media?	12:54PM
4	A. Right.	12:54PM
5	Q. Do you know Main Street Media?	12:54PM
6	A. Never heard of them.	12:54PM
7	Q. Have you heard of Main Street Media Tennessee?	12:54PM
8	A. Never heard of them.	12:54PM
9	Q. So you see that Mona Bagsby E-mailed Dawn	12:54PM
10	Curtis on February 17th, 2021?	12:55PM
11	A. Right.	12:55PM
12	Q. The subject was Main Street Media TN, Main	12:55PM
13	Street Today with Devon O'Day Show. Do you see that?	12:55PM
14	A. Yeah.	12:55PM
15	Q. Okay. In that E-mail, Mona writes, "Hi, Don.	12:55PM
16	I sure miss working with you. I would love to have	12:55PM
17	Mr. Mike Lindell on our show."	12:55PM
18	A. Right.	12:55PM
19	Q. "I don't have his personal assistant's info.	12:55PM
20	It was on my computer at WSM. Could you possibly put me	12:55PM
21	in touch? I have him in my phone with his cell phone,	12:55PM
22	but I respect his privacy and would rather go through	12:55PM
23	the correct channels. If you could help me with that, I	12:55PM
24	would really appreciate it." Do you see that?	12:55PM
25	A. Yeah.	12:55PM

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1	Q. And then do you see at the top that a response	12:55PM
2	comes from Katelyn Gamlin?	12:55PM
3	A. Uh-huh.	12:55PM
4	Q. And she's your executive assistant?	12:55PM
5	A. Yeah.	12:55PM
6	Q. And in 2021, was Katelyn Gamlin scheduling	12:55PM
7	media appearances for you, Mike Lindell?	12:55PM
8	A. She was screening them.	12:55PM
9	Q. I'm sorry. What?	12:55PM
10	A. She screened this one, yes.	12:55PM
11	Q. Okay. And she responded to Mona saying, "Thank	12:55PM
12	you for the time to reach out. My name is Katelyn, and	12:55PM
13	I'm Mike Lindell's scheduler. Unfortunately, at this	12:56PM
14	time we are not scheduling any additional interviews	12:56PM
15	unless the topic can be on Dominion and Smartmatic	12:56PM
16	machines. If that is not a topic available for	12:56PM
17	discussion, we are not able to accept at this time." Do	12:56PM
18	you see that?	12:56PM
19	A. Uh-huh.	12:56PM
20	Q. Do you know whether you did an appearance with	12:56PM
21	Main Street Media in 2021?	12:56PM
22	A. I don't know, but I will say this, the point	12:56PM
23	was that was -- that goes right in with every media we	12:56PM
24	went on, they're going, oh, you're getting cancelled,	12:56PM
25	you're getting cancelled, but I couldn't tell them why.	12:56PM

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1 So I'm going to save time. If I can't bring up the 12:56PM
 2 machine companies and say here's why we're getting 12:56PM
 3 cancelled, we want paper ballots hand counted, if I 12:56PM
 4 couldn't do that, I'm not going to waste my time with 12:56PM
 5 this media, whoever this was in Tennessee. 12:56PM

6 Q. Okay. 12:56PM

7 A. That's what this is screening. 12:56PM

8 Q. In 2021, were you not doing media appearances 12:56PM
 9 unless you could talk about Smartmatic? 12:56PM

10 A. No, that's not true. I was doing all kinds of 12:56PM
 11 media appearance as -- they wanted me on -- Fox Sports 12:56PM
 12 cancelled you, Mike. This cancelled you. I would take 12:56PM
 13 anything I could, but I wanted to say why I was getting 12:57PM
 14 cancelled. 12:57PM

15 Q. You wanted to identify -- 12:57PM

16 A. Because I wanted to get rid of the machine 12:57PM
 17 companies. Had nothing to do with Smartmatic or 12:57PM
 18 Dominion. You could include ES&S in there. You guys 12:57PM
 19 are just the biggest names out there because you sued 12:57PM
 20 everybody. 12:57PM

21 MR. KACHOUROFF: Nicole, was that 604? 12:57PM

22 MS. WRIGLEY: That was 604, yes. I'm about 12:57PM
 23 to mark 605. 12:57PM

24 MR. KACHOUROFF: Okay. 12:57PM

25 MS. WRIGLEY: And then maybe one more, and 12:57PM

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1 we'll take a break for lunch. 12:57PM

2 (Exhibit 605 marked.) 12:57PM

3 Q. (BY MS. WRIGLEY) I'm going to hand to you 12:57PM

4 Exhibit 605 -- 12:57PM

5 MR. KACHOUROFF: Thank you. 12:57PM

6 Q. (BY MS. WRIGLEY) -- Bates stamped DEF 009706. 12:57PM

7 Two pages. I'm going to start you at the back of this 12:57PM

8 document because the E-mail -- the first E-mail in the 12:57PM

9 chain is at the back. Can you go to the second page, 12:57PM

10 sir? 12:57PM

11 A. Yep. 12:57PM

12 Q. Do you see that there's a -- in the middle, 12:58PM

13 there's an E-mail on February 18th, 2021 from a 12:58PM

14 chris@humorousmathematicians, and it's a Chris Deluge, 12:58PM

15 cofounder and editor in chief? 12:58PM

16 A. Uh-huh. Yes. 12:58PM

17 Q. He writes, "Hello there. I would like to see 12:58PM

18 if I can get some info. We're doing a podcast 12:58PM

19 appearance by Mike Lindell. We have millions of 12:58PM

20 followers on our website. I would love to give Mike an 12:58PM

21 open platform with no censorship to discuss the election 12:58PM

22 fraud evidence, as we see how much this truth is being 12:58PM

23 censored. Please let me know whenever you can regarding 12:58PM

24 what it would take to make something like this happen." 12:58PM

25 Do you see that? 12:58PM

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1	A. Yeah.	12:58PM
2	Q. And then if you go to first page, do you see	12:58PM
3	that KG, Katelyn Gamlin, responds to Chris? It's at the	12:58PM
4	very bottom. It's on February 19th. Do you see that,	12:58PM
5	sir?	12:58PM
6	A. Yes.	12:58PM
7	Q. She writes, "Hello, Chris. Thanks for taking	12:58PM
8	the time to reach out. Before I'm able to look into	12:58PM
9	Mike's calendar, can you please provide a little more	12:59PM
10	information on your show, such as your show's reach,	12:59PM
11	guests you've had on, length of interview, open dates,	12:59PM
12	times, if it's audio, video, all the topics you'd	12:59PM
13	interested in and if the topic of Smartmatic or Dominion	12:59PM
14	and Smartmatic machines are able to be discussed." Do	12:59PM
15	you see that?	12:59PM
16	A. Right.	12:59PM
17	Q. And then do you see that there's a response by	12:59PM
18	Chris?	12:59PM
19	A. Yes.	12:59PM
20	Q. And he says, "Hey KG. For starters, we very	12:59PM
21	specifically want to talk about Dominion and Smartmatic.	12:59PM
22	Nothing will be off the table. We just want to give	12:59PM
23	Mike another platform." Do you see that?	12:59PM
24	A. Yes.	12:59PM
25	Q. Do you recall whether or not you appeared on	12:59PM

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1	this podcast?	12:59PM
2	A. Absolutely no idea.	12:59PM
3	Q. Okay. Do you recall appearing on podcasts and	12:59PM
4	talking about Smartmatic and election fraud in February	12:59PM
5	of 2021, sir?	12:59PM
6	A. If I could get on anything I could get on and	12:59PM
7	they would let me talk about why I was getting cancelled	12:59PM
8	and to save our country to get rid of these machines,	12:59PM
9	hundred percent.	01:00PM
10	Q. Okay.	01:00PM
11	A. But after February 5th, very few would have me	01:00PM
12	on. That's why I had to create FrankSpeech.	01:00PM
13	Q. In February of 2021, you wanted to get on --	01:00PM
14	wanted to get in the news or be with media talking about	01:00PM
15	Smartmatic machines, correct?	01:00PM
16	A. No. I wanted to get on the news to get rid --	01:00PM
17	to talk about their elections, to get rid of all machine	01:00PM
18	companies. You just happen to be one of them.	01:00PM
19	Q. Smartmatic does?	01:00PM
20	A. Yeah, absolutely.	01:00PM
21	Q. Okay. Now, in 2021, did you talk to any	01:00PM
22	election officials about not using Smartmatic voting	01:00PM
23	machines?	01:00PM
24	A. Say that again.	01:00PM
25	Q. In 2021, did you talk to any election officials	01:00PM

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1	about not using Smartmatic voting machines?	01:00PM
2	A. What do you mean by that?	01:00PM
3	Q. Did you talk to any election officials anywhere	01:00PM
4	in the country and the world and said don't use	01:00PM
5	Smartmatic voting machines?	01:00PM
6	A. I think I was very vocal. You can't keep going	01:00PM
7	to election officials. Which election officials was	01:00PM
8	I -- was going to go to? Biden? I mean, I wasn't going	01:00PM
9	to go into D.C., I'll tell you that, when he banned	01:01PM
10	MyPillow from coming in there and bringing reserves that	01:01PM
11	were laying in a garage on the ground with no pillows,	01:01PM
12	our armed forces, and I couldn't bring a MyPillow truck	01:01PM
13	in there because he wouldn't let me bring them free	01:01PM
14	pillows.	01:01PM
15	So no, I did not talk to our government	01:01PM
16	officials at that time.	01:01PM
17	Q. Have you ever talked to any election officials	01:01PM
18	about not using Smartmatic voting machines, ever?	01:01PM
19	A. Oh, about all voting machines. I don't bring	01:01PM
20	up specific Smartmatic. I've included ES&S. Now that	01:01PM
21	I've learned we have Hart, ES&S, all of these machines.	01:01PM
22	It's one big blob. They're all together.	01:01PM
23	Q. Okay.	01:01PM
24	A. It happened in every county, in every state.	01:01PM
25	It wasn't just LA County.	01:01PM

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1 Q. Do you understand whether any of these -- that
 2 whether or not these voting companies, ES&S, Hart
 3 InterCivic, Dominion, Smartmatic, whether they're all
 4 separate companies or whether they're the same, sir?

5 A. No, they're all separate, but they're all tied
 6 together through the Internet, because they're all
 7 online.

8 Q. Okay.

9 A. And I've got cast vote records for all of them.
 10 So you're all guilty.

11 Q. Okay.

12 A. Guilty.

13 Q. One more document. Sir, I'm going to hand you
 14 what's been marked as Exhibit 606. Okay?

15 (Exhibit 606 marked.)

16 A. Okay.

17 Q. (BY MS. WRIGLEY) For the record, this is DEF
 18 083580. This is part of a larger text chain. This one
 19 is an excerpt, Pages 1 and 35, and it's a text chain
 20 between Mike Lindell and Alexa, Wall Street Journal.

21 Sir, are you -- can you look at the top for
 22 me, please.

23 A. Uh-huh.

24 Q. Do you see this is a text chain between
 25 yourself and Alexa at The Wall Street Journal?

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1	A. Uh-huh.	01:03PM
2	Q. Do you see at the top it starts February 26,	01:03PM
3	2021?	01:03PM
4	A. Uh-huh.	01:03PM
5	Q. Do you know an Alexa at The Wall Street	01:03PM
6	Journal?	01:03PM
7	A. I know she's on my phone. I have every --	01:03PM
8	every journalist is on my phone in the whole country.	01:03PM
9	Q. Okay. You like to talk to journalists, don't	01:03PM
10	you, Mr. Lindell?	01:03PM
11	A. Huh?	01:03PM
12	Q. You like to talk to journalists?	01:03PM
13	A. Do I like to talk to them?	01:03PM
14	Q. Yes.	01:03PM
15	A. I like to try and save our country, and I'll	01:03PM
16	sit there and talk to them and tell them every	01:03PM
17	conversation is to get rid of these machines and go to	01:03PM
18	paper ballots hand counted.	01:03PM
19	You can ask every journalist in this	01:03PM
20	country that makes -- they're all on the Left because	01:03PM
21	the Right ones, once again, they're afraid to talk	01:03PM
22	because of lawfare.	01:03PM
23	Q. Putting aside election fraud, do you like to be	01:03PM
24	in the news, Mr. Lindell?	01:03PM
25	A. Huh?	01:03PM

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1	Q. Do you like to be in the news?	01:03PM
2	A. Do I like to be in the news? Only to try and	01:03PM
3	save our country.	01:03PM
4	Q. Okay.	01:03PM
5	A. My voice, if you suppress that --	01:03PM
6	Q. And prior to the 2020 election --	01:03PM
7	A. If you read my book, you know I was very much	01:03PM
8	afraid of public speaking, if you've read my book, and I	01:03PM
9	think you should.	01:03PM
10	Q. Mr. Lindell, let me ask you this: Prior to	01:03PM
11	2020, did you like to be in the news, sir?	01:03PM
12	A. Prior to 2020, the only thing I was in the	01:03PM
13	news -- not prior to 2020. You're going to have to go	01:04PM
14	back when I first went on TV with MyPillow if you want	01:04PM
15	me to take you back to the transition. I was petrified	01:04PM
16	to talk in front of any crowds.	01:04PM
17	I could do commercials for MyPillow.	01:04PM
18	Because when I have a compassion or passion for	01:04PM
19	something, when I believe in something, I don't stop. I	01:04PM
20	can talk your ear off. But when I -- if something --	01:04PM
21	just smalltalk or talking, no. No.	01:04PM
22	Q. In 2021, how many media appearances do you	01:04PM
23	think you did?	01:04PM
24	A. I have no idea. Not as -- probably not as many	01:04PM
25	as 2020, because 2020 when I was banned from talking.	01:04PM

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1 Q. Why do you have all these journalists' numbers
 2 in your phone?

3 A. What's that?

4 Q. Why do you have all these numbers in your
 5 phone?

6 A. Because they attack me every single day or
 7 almost weekly to do stories. They do it for their
 8 glamour stories, that Mike Lindell, this conspiracy.
 9 Mike Lindell's losing MyPillow. Mike Lindell just lost
 10 another hundred million. Will he ever shut up? Mike
 11 Lindell, you know. The Wall Street Journal, they're
 12 all -- what I do now is I make them read my book, and
 13 then they're torn, like when I was on Jimmy Kimmel.

14 But I will do whatever it takes to get the
 15 word out to save our country, and that's it. And this
 16 has nothing to do with Republican or Democrat. It has
 17 to do with get rid of computers in our election, period.

18 Why do you think I'm being attacked now?
 19 It's not over the 2020 election. It's because I came
 20 out with a plan last August to secure our elections.

21 I -- we're going county by county to get rid of these --

22 THE COURT REPORTER: Slow down, please.

23 A. We're going county by county to get rid of
 24 these voting machines. We've got over 250 committed to
 25 go to paper ballots hand counted.

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1	Q. (BY MS. WRIGLEY) You personally are going	01:05PM
2	county by county, sir?	01:05PM
3	A. My team. I have over 300,000 people in all 50	01:05PM
4	states.	01:05PM
5	Q. Now, if you can look at Exhibit 606, please.	01:05PM
6	A. Uh-huh.	01:05PM
7	Q. This chain starts on February 16, 2021. Do you	01:05PM
8	see that?	01:05PM
9	A. Uh-huh.	01:05PM
10	Q. And Alexa from The Wall Street Journal texts	01:05PM
11	you. "Hi, Mike. It's Alexa Corse from The Wall Street	01:05PM
12	Journal."	01:05PM
13	A. Yeah.	01:05PM
14	Q. "I'm sorry we didn't connect last week. Do you	01:05PM
15	have ten minutes to chat on the phone today about voting	01:05PM
16	machines?" Do you see that?	01:06PM
17	A. Uh-huh.	01:06PM
18	Q. And then on the 22nd of February, 2021, she	01:06PM
19	texts you. "Hi, Mike. I just E-mailed you Dominion's	01:06PM
20	lawsuit." Do you see that?	01:06PM
21	A. Uh-huh.	01:06PM
22	Q. And you said "Thanks," correct? Do you see	01:06PM
23	that?	01:06PM
24	A. Yes.	01:06PM
25	Q. She responds, "Hi, Mike. Can you send the list	01:06PM

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1	of retailers who dropped MyPillow?" Do you see that?	01:06PM
2	A. Yes.	01:06PM
3	Q. And then you say, "Yes," correct?	01:06PM
4	A. Uh-huh. Yes.	01:06PM
5	Q. And so she's asking for information from you,	01:06PM
6	and you're providing it, correct?	01:06PM
7	A. That's correct.	01:06PM
8	Q. And this is The Wall Street Journal, right?	01:06PM
9	A. Right.	01:06PM
10	Q. Okay. Then she says, "Thank you. I will	01:06PM
11	affirm message about that." Do you see that?	01:06PM
12	A. Yes.	01:06PM
13	Q. And she seems pretty friendly in this text to	01:06PM
14	you, correct?	01:06PM
15	A. They all -- they all act that way.	01:06PM
16	Q. Okay. And then do you see that she also says,	01:06PM
17	"Hi, Mike. It's Alexa from WSJ. Have you been served	01:06PM
18	with the Dominion lawsuit yet?" Do you see that?	01:06PM
19	A. Yep. Yes.	01:06PM
20	Q. And it continues on the next page. This is	01:06PM
21	January 18, 2022.	01:06PM
22	A. Yeah.	01:06PM
23	Q. "Hi, Mike. It's Alexa Corse from The Wall	01:06PM
24	Street Journal. Do you have a comment on Smartmatic	01:06PM
25	suing you today?" Do you see that?	01:06PM

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1	A. Yeah.	01:07PM
2	Q. And you wrote her back, correct?	01:07PM
3	A. Yes.	01:07PM
4	Q. And you wrote, "It's a great day for America!"	01:07PM
5	A. That's correct.	01:07PM
6	Q. And you were glad Smartmatic sued you, correct?	01:07PM
7	A. What's that?	01:07PM
8	Q. You were glad that Smartmatic sued you?	01:07PM
9	A. Both of you, because we could finally get the	01:07PM
10	evidence, the terabytes in your hands, which you have in	01:07PM
11	your hands. You've had them for a long time now.	01:07PM
12	Q. And, Mr. Lindell, you essentially provoked	01:07PM
13	Smartmatic into suing you, correct?	01:07PM
14	A. Provoked what?	01:07PM
15	Q. You essentially provoked Smartmatic into suing	01:07PM
16	you, correct?	01:07PM
17	A. No. No, that's not true at all.	01:07PM
18	Q. What --	01:07PM
19	A. Because remember, my lawyer sued them first.	01:07PM
20	Smartmatic tried to hide, like all the machine	01:07PM
21	companies, of all the corruption of their machines being	01:07PM
22	online, and I want to save our country. I care about	01:07PM
23	America and I care about my children and grandchildren.	01:07PM
24	That's all I care about is saving our country.	01:07PM
25	And I'm sorry you work for a company that	01:07PM

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1 has electronic voting machines. Nothing against you
 2 personally. You're just doing your job. You picked a
 3 bad company to work for.

4 Q. Mr. --

5 A. But the reason I say it's a great day for
 6 America, because finally we could get exposed and get
 7 exposes. But we learned so much in the last three
 8 years. We were able to get the cast vote records from
 9 LA County. We were able to find out China directly
 10 involved with LA County. So many things now that we
 11 have on you guys, I don't even know why we're here, but
 12 that's okay. We go through the process.

13 Q. Mr. Lindell, you came out with "Absolute Proof"
 14 in -- on February 5th --

15 A. Yeah.

16 Q. -- 2021, correct?

17 A. Right.

18 Q. And Smartmatic hadn't sued you by that time,
 19 right?

20 A. That's correct.

21 Q. And you mentioned Smartmatic in that
 22 documentary, correct?

23 A. Yeah.

24 Q. And you did a number of documentaries in the
 25 months after "Absolute Proof" where you, again,

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1	mentioned Smartmatic in connection with election fraud,	01:08PM
2	correct?	01:08PM
3	A. Uh-huh.	01:08PM
4	Q. And Smartmatic had not sued you in those	01:08PM
5	months, correct?	01:08PM
6	A. You know, I watched the movie Kill Chain.	01:08PM
7	Okay?	01:08PM
8	Q. Mr. Lindell --	01:08PM
9	A. I watched the movie Kill Chain -- let me	01:08PM
10	finish. You say that.	01:08PM
11	And in Kill Chain, my own senator, Amy	01:08PM
12	Klobuchar, she's a Democrat, and Kamala Harris, the Vice	01:08PM
13	President, they all mention in there, hey, these four	01:08PM
14	companies control all our elections, and they said,	01:08PM
15	we've got to stop this. And they name Smartmatic, Hart,	01:09PM
16	Dominion and one other one.	01:09PM
17	And Amy Klobuchar, you guys didn't sue her.	01:09PM
18	Was that provoking you? She was -- her freedom of	01:09PM
19	speech. It's the movie Kill Chain. I watched it. I'm	01:09PM
20	going, wow, even the Democrats want these machine	01:09PM
21	companies gone. You guys -- was that provoking you?	01:09PM
22	No. That was their concern because of these machines.	01:09PM
23	She -- you just happen to be one of the brands. That's	01:09PM
24	it.	01:09PM
25	MS. WRIGLEY: Mr. Lindell, I'm going to	01:09PM

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1	move to strike as nonresponsive.	01:09PM
2	Q. (BY MS. WRIGLEY) Let me ask you this: When	01:09PM
3	"Absolute Proof" came out, had Smartmatic sued you at	01:09PM
4	that point in time?	01:09PM
5	A. No. You just sued Fox News.	01:09PM
6	Q. Okay. And when you put out "Absolute	01:09PM
7	Interference," had Smartmatic sued you at that point in	01:09PM
8	time, sir?	01:09PM
9	A. No.	01:09PM
10	Q. Okay. When you put out "Scientific Proof," had	01:09PM
11	Smartmatic sued you at that point in time?	01:09PM
12	A. Nope. They waited a year.	01:09PM
13	Q. Okay. And you mentioned Smartmatic being	01:09PM
14	involved in the 2020 election in both "Scientific Proof"	01:09PM
15	and "Absolute Interference," correct?	01:09PM
16	A. I don't know. I haven't seen Scientific Proof.	01:09PM
17	I think that was Doug Frank, and he's a scientist.	01:09PM
18	Q. Now, you also did a Cyber Symposium in August	01:09PM
19	of 2021, correct?	01:10PM
20	A. That's correct.	01:10PM
21	Q. And that was over the course of one or	01:10PM
22	two days, correct?	01:10PM
23	A. Three days.	01:10PM
24	Q. Three days. And you mentioned Smartmatic in	01:10PM
25	connection with that Cyber Symposium?	01:10PM

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1	A. I don't know if I did. I mentioned all	01:10PM
2	machines there, every state.	01:10PM
3	Q. And had Smartmatic sued you at that point, sir?	01:10PM
4	A. No.	01:10PM
5	Q. And in promoting "Absolute Interference," you	01:10PM
6	talked to Steve Bannon and you talked to Dan Ball on One	01:10PM
7	America News, and you basically said that you wanted	01:10PM
8	Smartmatic to sue you, correct?	01:10PM
9	A. Yeah, so we could get the evidence out there	01:10PM
10	because --	01:10PM
11	Q. And you wanted Dominion to sue you, correct?	01:10PM
12	A. So we could get the evidence, correct.	01:10PM
13	Q. And at that time point in time, Smartmatic had	01:10PM
14	not sued you, correct?	01:10PM
15	A. That's correct.	01:10PM
16	Q. And then later that year, at the end of 2021,	01:10PM
17	you, yourself sued Smartmatic, correct?	01:10PM
18	A. No. That was early in '21, but the lawyers	01:10PM
19	sued Smartmatic.	01:10PM
20	Q. Smartmatic or Dominion, sir?	01:10PM
21	A. Smartmatic and Do- -- no, just -- I don't know.	01:10PM
22	Both, I guess --	01:10PM
23	Q. And --	01:10PM
24	A. -- after Dominion had sued me.	01:10PM
25	Q. Your claims against Dominion were dismissed by	01:10PM

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1	a federal judge, correct?	01:10PM
2	A. Yes, on the second day of the Cyber Symposium.	01:10PM
3	Very suspicious.	01:10PM
4	Q. And you find that dismissal suspicious,	01:10PM
5	correct?	01:11PM
6	A. Yeah, very suspicious.	01:11PM
7	Q. Okay. And you think that there's a federal	01:11PM
8	judge in the District of Columbia involved in protecting	01:11PM
9	Smartmatic, right?	01:11PM
10	A. Here's my statement to that: I find it very	01:11PM
11	strange that Smartmatic would not have opened up their	01:11PM
12	machines for the world and say, hey, we don't have	01:11PM
13	nothing to hide.	01:11PM
14	And then they sue, not Mike Lindell, but	01:11PM
15	they sue MyPillow a year later, that it was some	01:11PM
16	elaborate scheme for their CEO to make money using promo	01:11PM
17	codes, when we -- at that point, we had lost \$300	01:11PM
18	million, and we were in disarray. And I'm a pretty good	01:11PM
19	marketer. You said it earlier in the -- I think you're	01:11PM
20	a pretty good marketer. I think I'd quit doing	01:11PM
21	something like that if I didn't believe what I was	01:11PM
22	doing. It doesn't matter if we don't have a country.	01:11PM
23	You know, that's the whole point.	01:11PM
24	Q. Mr. Lindell, I want to ask you a couple of	01:11PM
25	questions about Smartmatic. Who's the CEO of	01:11PM

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1	Smartmatic?	01:11PM
2	A. I don't know right now. I have all that data.	01:11PM
3	I don't have it right now in front of me.	01:11PM
4	Q. Okay. How many employees does Smartmatic have	01:11PM
5	in the United States?	01:11PM
6	A. I don't know currently.	01:11PM
7	Q. Okay.	01:11PM
8	A. Don't know -- do you know how many I have? I	01:11PM
9	don't know how many you have.	01:11PM
10	Q. I do now how many you have, sir.	01:11PM
11	But I want to ask you about Smartmatic.	01:12PM
12	Are you aware that Smartmatic employs people who work in	01:12PM
13	the United States, sir?	01:12PM
14	A. I know they've got a lot overseas, too, but	01:12PM
15	yeah, they've got some, I suppose, in the United States.	01:12PM
16	Q. Okay. Okay. And do you know where Smartmatic	01:12PM
17	has offices in the United States?	01:12PM
18	A. I think I know where a couple are, but I don't	01:12PM
19	know now.	01:12PM
20	Q. Have you ever been to one of the offices of	01:12PM
21	Smartmatic?	01:12PM
22	A. No.	01:12PM
23	Q. Okay. Have you ever talked to an employee of	01:12PM
24	Smartmatic, sir?	01:12PM
25	A. Yes.	01:12PM

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1	Q. Who?	01:12PM
2	A. I'm not naming his name. It's a whistleblower.	01:12PM
3	Q. It's a whistleblower. What's his name, sir?	01:12PM
4	A. I'm not naming your name -- a name -- a name.	01:12PM
5	I don't know it right now. I can't even remember.	01:12PM
6	Q. When did he work for Smartmatic?	01:12PM
7	A. Huh?	01:12PM
8	Q. When did he work for Smartmatic?	01:12PM
9	A. I think in 2020.	01:12PM
10	Q. What did he do?	01:12PM
11	A. I don't know. I don't know right now.	01:12PM
12	Q. How do you know he worked for Smartmatic?	01:12PM
13	A. I don't know that either.	01:12PM
14	Q. Okay.	01:12PM
15	A. You asked me if I knew an employee. He said he	01:12PM
16	was.	01:12PM
17	Q. How many countries does Smartmatic provide	01:12PM
18	election technology or services for in the world, sir?	01:12PM
19	A. I don't know that. I know that it's very	01:12PM
20	corrupt in the Philippines. I'm friends with a lot of	01:12PM
21	people in the Philippines, senators and stuff, and I	01:12PM
22	know they got into all kinds of trouble with the	01:12PM
23	corruption. I know there's a big lawsuit against them	01:13PM
24	going on in Florida right now for all the stuff they've	01:13PM
25	done overseas. I don't know the details on it. I heard	01:13PM

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1 it's going to break everything open, and all this goes
 2 away, too.

3 MS. WRIGLEY: Okay. I'm going to move to
 4 strike as nonresponsive.

5 Q. (BY MS. WRIGLEY) How many countries do you
 6 know, one way or the other, Smartmatic provides election
 7 technology and services in the world?

8 A. I don't know that, their current footprint.

9 Q. Okay. How long has Smartmatic been in
 10 business, sir?

11 A. I believe since around the year 2000.

12 Q. Around the year 2000. And how do you know
 13 that?

14 A. Huh?

15 Q. How do you know that?

16 A. From the research this guy did that we paid a
 17 quarter million dollars to do massive research and deep
 18 dive into the genesis of Smartmatic. We have little
 19 charts of all the people that -- this corrupt guy over
 20 here, this guy and this guy over here and this guy.

21 It -- this was a massive report we got.

22 Q. And who did you pay that -- who did you pay to
 23 do that report on Smartmatic, sir?

24 A. I'd have to get the name from my lawyer.

25 That's -- I had a different lawyer then. We -- he hired

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1 them at that time, this whole company. I don't know --
2 I don't remember his name.

3 Q. Now, if you can look back to Exhibit 606, at
4 the end of this text that you're having with The Wall
5 Street Journal, do you see at the end you texted her and
6 said, "I am so happy they finally sued me...now we can
7 add them to the evidence and depose them"?

8 A. That's right.

9 Q. "Now, if ES&S voting machines would hurry up
10 and sue...we would have the most" -- "we would have most
11 of the corrupt machine companies." Do you see that?

12 A. That's correct.

13 Q. Okay. Do you recall being on Pete Santilli's
14 show to talk about Smartmatic in 2021?

15 A. I have no idea. I just -- no idea.

16 Q. Do you know who Pete San- --

17 A. I know who Pete Santilli is.

18 Q. Did you appear on Pete Santilli's show?

19 A. I don't know.

20 Q. Did you appear on Mr. Santilli's show in 2021?

21 A. I don't know.

22 Q. Did you appear on that show and talk about
23 Smartmatic in 2021?

24 A. I don't know.

25 MS. WRIGLEY: Okay. We're going to take a

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1	break for lunch.	01:15PM
2	THE WITNESS: Okay.	01:15PM
3	THE VIDEOGRAPHER: And we're going off the	01:15PM
4	record at 1:15.	01:15PM
5	(Lunch recess.)	01:44PM
6	(Exhibits 607-610 marked.)	01:44PM
7	THE VIDEOGRAPHER: And we're back on the	01:44PM
8	record at 1:45.	01:45PM
9	Q. (BY MS. WRIGLEY) Mr. Lindell, I'm going to	01:45PM
10	hand you Exhibit 611.	01:45PM
11	(Exhibit 611 marked.)	01:45PM
12	A. Okay.	01:45PM
13	Q. (BY MS. WRIGLEY) For the record, this was	01:45PM
14	marked as an exhibit to the complaint, and it contains	01:45PM
15	screenshots from "Absolute Interference."	01:45PM
16	And actually, before I ask you some	01:45PM
17	questions about this, do you recall putting out a	01:45PM
18	documentary movie called "Absolute Interference"?	01:45PM
19	A. Yes.	01:45PM
20	Q. And when did you release "Absolute	01:45PM
21	Interference"?	01:45PM
22	A. I think around the end of April '21.	01:45PM
23	Q. Okay. April of '21?	01:45PM
24	A. April of '21.	01:45PM
25	Q. Okay. Looking at Exhibit 611, it's got a	01:45PM

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1 number of screenshots from that, and I want to walk
 2 through some of them with you, Mr. Lindell.

3 A. Uh-huh.

4 Q. Do you see screenshot A, which is the first
 5 page in, and it says, "Mike Lindell presents 'Absolute
 6 Interference'"? Do you see that image?

7 A. Yep.

8 Q. Do you recognize that as an image that appeared
 9 in connection with your "Absolute Interference"
 10 documentary?

11 A. The "Absolute Proof" [sic] one, right? If I
 12 had a chance, I do, yes.

13 Q. And the subtitles here states, "The sequel to
 14 'Absolute Proof' with new evidence foreign and domestic
 15 enemies used computers to hack the 2020 election." Do
 16 you see that?

17 A. Yes.

18 Q. And was that the subtitle for "Absolute
 19 Interference"?

20 A. Yes. Yes.

21 Q. And "Absolute Interference" has as the subject
 22 matter "Hacking the 2020 Election," correct?

23 A. Yes.

24 Q. Now, if I go to screenshot B, do you see where
 25 it says "A hundred percent cyber attack"?

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1	A. Uh-huh.	01:46PM
2	Q. Do you recognize that as being part of the	01:46PM
3	"Absolute Interference" documentary?	01:46PM
4	A. I don't know. If you say so. I don't know.	01:46PM
5	Q. Okay. Let's go to screenshot C, see if you	01:47PM
6	recognize this image.	01:47PM
7	A. Yeah, I recognize that.	01:47PM
8	Q. Okay. And that's yourself, correct?	01:47PM
9	A. Yes.	01:47PM
10	Q. And you were one of the presenters of "Absolute	01:47PM
11	Interference"?	01:47PM
12	A. I was the host.	01:47PM
13	Q. You were the host. Okay.	01:47PM
14	And if you turn to the next page,	01:47PM
15	screenshot D, do you see that you appear on that	01:47PM
16	screenshot?	01:47PM
17	A. With General Flynn, yes.	01:47PM
18	Q. And the individual on screenshot D is General	01:47PM
19	Michael Flynn?	01:47PM
20	A. That's correct.	01:47PM
21	Q. Okay. And did you do a discussion with General	01:47PM
22	Michael Flynn in "Absolute Interference"?	01:47PM
23	A. I don't know. I'd have to watch it. I guess.	01:47PM
24	Q. Okay.	01:47PM
25	A. He was in the show.	01:47PM

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1	Q. He appeared -- General Michael Flynn appeared	01:47PM
2	on "Absolute Interference"?	01:47PM
3	A. Uh-huh.	01:47PM
4	Q. Okay. Now, let me have you flip a few	01:47PM
5	screenshots back, and I'm going to take you to	01:47PM
6	screenshot G and ask you about what appears there. And	01:47PM
7	let me know when you're there.	01:47PM
8	A. Which one?	01:47PM
9	Q. G. Like the --	01:48PM
10	A. G like --	01:48PM
11	Q. Yeah.	01:48PM
12	A. Okay. Yep. After Doug Frank.	01:48PM
13	Q. Do you see yourself on the screenshot?	01:48PM
14	A. Yes.	01:48PM
15	Q. And there's a gentleman with you here, correct?	01:48PM
16	A. Yep.	01:48PM
17	Q. Who is this gentleman?	01:48PM
18	A. That's Dr. Douglas Frank.	01:48PM
19	Q. Okay. And Dr. Douglas Frank appeared on	01:48PM
20	"Absolute Interference," correct?	01:48PM
21	A. Correct.	01:48PM
22	Q. And Dr. Douglas Frank presented with you about	01:48PM
23	evidence he contended show that there was fraud in the	01:48PM
24	2020 presidential election, correct?	01:48PM
25	A. Hundred percent, yes.	01:48PM

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1	Q. Okay. And let me have you flip back to	01:48PM
2	screenshot J.	01:48PM
3	A. Screenshot J.	01:48PM
4	Q. Do you recognize this image from "Absolute	01:48PM
5	Interference"?	01:48PM
6	A. Right here, this thing?	01:48PM
7	Q. Yes.	01:48PM
8	A. Yes.	01:48PM
9	Q. And do you see where it says, "On the phone	01:48PM
10	with confidential informant number 3"? Do you see that?	01:48PM
11	A. Yes.	01:49PM
12	Q. Who was this confidential informant number 3?	01:49PM
13	A. You know, I don't know. It could have been	01:49PM
14	Conan Hayes. I don't know.	01:49PM
15	Q. Did you know who it was at the time --	01:49PM
16	A. Yes. Yes.	01:49PM
17	Q. -- that this appeared on the phone?	01:49PM
18	A. Yes.	01:49PM
19	Q. Okay.	01:49PM
20	A. My guess is Conan Hayes, but I don't know. I	01:49PM
21	can't -- I'm not going to say if I'm 98 percent sure.	01:49PM
22	Q. Okay. And why was it number 3? Was there any	01:49PM
23	significance to identifying him as confidential	01:49PM
24	informant number 3?	01:49PM
25	A. I didn't put that on there. I don't know.	01:49PM

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1	Like I said, these were all picked by -- probably by	01:49PM
2	Mary Fanning, all the guests, again. I have -- some of	01:49PM
3	them I've never met these people, most of them.	01:49PM
4	Dr. Frank -- just so you know, Dr. Frank,	01:49PM
5	first time I met him, when this was filmed, it was so	01:49PM
6	intriguing and so like answers to everything, because he	01:49PM
7	had found an algorithm from another direction, that I	01:49PM
8	stopped the presses, and that's when we did "Scientific	01:49PM
9	Proof," the same day it was filmed, a completely	01:49PM
10	one-hour segment.	01:49PM
11	Q. Now, if you go to screenshot K --	01:49PM
12	A. Uh-huh.	01:49PM
13	Q. -- do you recognize this from "Absolute	01:50PM
14	Interference"?	01:50PM
15	A. Who?	01:50PM
16	Q. Do you recognize the image from screenshot K?	01:50PM
17	A. I do, but I don't see the guy's picture.	01:50PM
18	Q. Okay. Did you have a sit-down with an	01:50PM
19	individual whose face was blurred out in "Absolute	01:50PM
20	Interference"?	01:50PM
21	A. I don't know. I didn't know it was blurred	01:50PM
22	out. This is the first time I've seen this.	01:50PM
23	Q. Do you know who this individual is?	01:50PM
24	A. No, I don't.	01:50PM
25	Q. Did you know at the time?	01:50PM

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1 A. I -- I didn't know his name. I -- you know, I 01:50PM
 2 remember there were a lot of people there. I still 01:50PM
 3 don't know their name, because there was a lot of people 01:50PM
 4 brought in from other states, and these were all 01:50PM
 5 different people. I don't -- I have no idea that guy's 01:50PM
 6 name or who he was. 01:50PM

7 Q. Okay. Now, if I could have you turn back to 01:50PM
 8 the very -- actually, back to the screenshot we looked 01:50PM
 9 at that had the confidential informant number 3, 01:50PM
 10 screenshot J. 01:50PM

11 A. Yeah. Number what? 01:50PM

12 Q. J. 01:50PM

13 A. Oh, J. I'm sorry. Yeah. 01:50PM

14 Q. Do you see the image at the bottom right-hand 01:50PM
 15 corner where it has sort of the cover shot of Absolute 01:51PM
 16 Interference with the maps? 01:51PM

17 A. This here? 01:51PM

18 Q. Yeah. 01:51PM

19 A. Yes, I see it. 01:51PM

20 Q. And then do you see at the bottom it says, 01:51PM
 21 "Executive producers, Mike Lindell, Brannon Howse and 01:51PM
 22 Mary Fanning"? 01:51PM

23 A. Correct. 01:51PM

24 Q. And were those the executive producers of 01:51PM
 25 "Absolute Interference"? 01:51PM

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1 A. Were they? Yeah, same people as "Absolute
2 Proof."

3 Q. Okay. So you produced "Absolute Interference"
4 with Brannon Howse and Mary Fanning?

5 A. All I did was host. I had no idea what I was
6 going to say. Brannon did all the filming and
7 production, and Mary Fanning provided the content, all
8 the guests.

9 Q. Before this was released, "Absolute
10 Interference," did you intend for Smartmatic to be named
11 as part of an election fraud conspiracy?

12 A. I didn't know what was going to be said by
13 these guys. I had no clue, absolutely no clue.

14 Q. You didn't have any clue what any of these
15 individuals were going to say before Absolute
16 Interference?

17 A. No. Absolutely none. They said we're bringing
18 in a hole other crew group and they're getting more
19 witnesses, more evidence. Dr. Doug Frank was the most
20 amazing because he got all his evidence right from the
21 counties and the states.

22 Q. Well, let's -- I'm going to play a couple clips
23 from "Absolute Interference."

24 A. Okay.

25 Q. It's a little bit long. So this is clips just

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1	like --	01:52PM
2	A. Okay.	01:52PM
3	Q. -- the rest of them. My colleague's going to	01:52PM
4	come around.	01:52PM
5	The first one is going to be marked	01:52PM
6	Exhibit 612.	01:52PM
7	A. Okay.	01:52PM
8	Q. The second one will be 613, and then the third	01:52PM
9	one will be 614.	01:52PM
10	(Exhibits 612-614 marked.)	01:52PM
11	MR. KACHOUROFF: In the future, you can	01:52PM
12	just do one. It doesn't need to be --	01:52PM
13	(Clip from "Absolute Interference.")	01:52PM
14	MR. LINDELL: And it rhymes with Dominion	01:52PM
15	and it rhymes with Smartmatic and ES&S. All these	01:52PM
16	machines that were used out there cannot be done by	01:52PM
17	humans. And you have to have access, before, during and	01:52PM
18	after.	01:52PM
19	(Clip ends.)	01:52PM
20	Q. (BY MS. WRIGLEY) That was clip 1, Mr. Lindell.	01:52PM
21	Before I have my colleague play 613, do you	01:52PM
22	recognize yourself on that clip?	01:52PM
23	A. Uh-huh.	01:52PM
24	Q. And did you identify Smartmatic?	01:52PM
25	A. Did I what?	01:53PM

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1	Q. Did you identify Smartmatic in that?	01:53PM
2	A. Yeah, ES&S and Dominion. I wasn't prejudiced.	01:53PM
3	It was all, yeah.	01:53PM
4	Q. Okay. But you did mention the name Smartmatic?	01:53PM
5	A. Oh, yeah. Absolutely.	01:53PM
6	Q. Okay. All right. Let's look at 613.	01:53PM
7	(Clip from "Absolute Interference.")	01:53PM
8	MR. LINDELL: All these things that -- and	01:53PM
9	I kept telling them, you know what? The -- and the	01:53PM
10	reason they're doing that is because I have proof, a	01:53PM
11	hundred percent proof that our country was attacked by	01:53PM
12	China, by communism coming in, this foreign interference	01:53PM
13	to our elections through the machines, Dominion,	01:53PM
14	Smartmatic, ES&S, all of them.	01:53PM
15	(Clip ends.)	01:53PM
16	Q. (BY MS. WRIGLEY) And, Mr. Lindell, do you	01:53PM
17	recognize yourself in that video?	01:53PM
18	A. Oh, yeah.	01:53PM
19	Q. That was from "Absolute Interference," correct?	01:53PM
20	A. Yeah.	01:53PM
21	Q. And you intended to specifically reference	01:53PM
22	Smartmatic in connection with --	01:53PM
23	A. No. No. I was all inclusive. I was not	01:53PM
24	prejudiced against Smartmatic. I included ES&S and	01:53PM
25	Dominion. I did forget Hart.	01:53PM

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1 Q. But you did mention Smartmatic, correct? 01:53PM

2 A. Absolutely. 01:53PM

3 Q. Okay. Let's look at 614. 01:54PM

4 (Clip from "Absolute Interference.") 01:54PM

5 MR. LINDELL: You know, this all started 01:54PM
6 back in Venezuela when they took that country in a 01:54PM
7 couple years when Smartmatic started back then, and, you 01:54PM
8 know, these machines have been -- you know, it's a tool. 01:54PM
9 Anyone can, you know, win any election. Well, I want to 01:54PM
10 win this one. You know, they asked me, would you run? 01:54PM
11 I said, I wouldn't run for a dogcatcher right now 01:54PM
12 because somebody else could pick the winner. 01:54PM

13 (Clip ends.) 01:54PM

14 Q. (BY MS. WRIGLEY) Mr. Lindell -- 01:54PM

15 A. That's when I decided not to run for governor. 01:54PM

16 Q. Mr. Lindell, looking at that clip marked 614, 01:54PM
17 did you recognize yourself in that video clip from 01:54PM
18 "Absolute Interference"? 01:54PM

19 A. Uh-huh. 01:54PM

20 Q. And you -- I'm sorry. You have to -- 01:54PM

21 A. That's when I decided not to run for governor, 01:54PM
22 not that moment. But I decided way before that, because 01:54PM
23 if machines were involved, what's the sense? 01:54PM

24 Q. But that was you in the clip, correct? 01:54PM

25 A. Oh, absolutely. 01:54PM

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1 Q. And you specifically named Smartmatic in that
2 one, correct?

3 A. I didn't hear if I said Smartmatic at the
4 beginning. But if I did, I did, yes. Yes. I'll say
5 yes.

6 Q. Okay. Now, in connection with making "Absolute
7 Interference," did you do media appearances to discuss
8 or promote that documentary?

9 A. I don't think so. I don't know. They
10 wouldn't -- you got to realize nobody would have me on,
11 and the only -- the only ones were attack media that
12 would have me on, unless it was Bannon, but the -- you
13 know.

14 Q. Did you appear with Steve Bannon on his
15 podcast --

16 A. I --

17 Q. -- War Room to discuss "Absolute Interference"?

18 A. I don't know. If FrankSpeech was done by then,
19 I did, because I just went on -- I think this was done
20 and I already had FrankSpeech, so I didn't need anybody
21 else.

22 I think I did a three-day marathon,
23 actually. In fact, I think -- I know I did, because
24 when this got completed, Alan Duke is a Facebook fact
25 checker on lead stories, and him and I went back and

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1 forth. And he actually put up false information over it
 2 when it was released, within 20 minutes, and he couldn't
 3 have even watched it. So I was very upset with him.

4 By the way, we gave Alan Duke all the
 5 evidence, and they validated it, and then he said,
 6 well -- he says, I -- Mike, I can't go public with it
 7 because we only say if something's false, not if it's
 8 true.

9 Q. I'm going to show you a clip from an appearance
 10 on Bannon's War Room.

11 MS. WRIGLEY: For the record, I'm going to
 12 mark this first clip as 615. The second clip will be
 13 616.

14 (Exhibits 615-616 marked.)

15 Q. (BY MS. WRIGLEY) For the record, my
 16 understanding is is this is from a March 26, 2021
 17 appearance on War Room.

18 We'll watch these two clips, and then I'll
 19 ask you questions.

20 MR. KACHOUROFF: 615 and 616?

21 MS. WRIGLEY: Yes.

22 (Clip of Steve Bannon and Mike Lindell.)

23 STEVE BANNON: I want to go back to Mike
 24 Lindell. So, Mike, I just want to put this in
 25 perspective for our audience.

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1 You made this film, "Absolute Proof." Came 01:56PM
 2 out in February, caused a huge -- you know, a huge 01:56PM
 3 blowup. The media, who was all excited about every one 01:56PM
 4 of your movies, everyone except Total Cryptics, right, 01:56PM
 5 all of a sudden stopped seeing any articles about this. 01:56PM

6 You and Dominion finally got into this 01:56PM
 7 legal situation, right, where they sued you. You've now 01:57PM
 8 come out, and instead of either backing down or working 01:57PM
 9 out some deal with Dominion or working out some 01:57PM
 10 compromise or saying you're sorry, you've now tripled 01:57PM
 11 down, you've made another film called "Absolute 01:57PM
 12 Interference." 01:57PM

13 For our audience, why were you -- are you 01:57PM
 14 going to -- when are you going to release this next 01:57PM
 15 movie, "Absolute Interference"? 01:57PM

16 MR. LINDELL: Well, the one -- the one 01:57PM
 17 part -- the one guest was so good that I made an hour 01:57PM
 18 show, and we're going to release that later in the week. 01:57PM
 19 You can see that on LindellTV.com. 01:57PM

20 Then -- and then the following week, we'll 01:57PM
 21 release out "Absolute Interference," and that could -- 01:57PM
 22 so it could be later in the week. We haven't set the 01:57PM
 23 exact date on that yet. 01:57PM

24 I kind of want to line that up with my -- 01:57PM
 25 launching my new social media platform, which will be 01:57PM

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1	Frank. But this -- when you watch this -- and all of	01:57PM
2	you've see "Absolute Proof," you know, we're just going	01:57PM
3	to keep dropping more and more.	01:58PM
4	It's going to be to the point that the only	01:58PM
5	announcement I'll be able to make is, hey, if you work	01:58PM
6	for Dominion and you were part of this crime against	01:58PM
7	humanity, turn yourself in, save yourself some jail	01:58PM
8	time. That's all I can say. I mean, I don't know what	01:58PM
9	else to say to these people.	01:58PM
10	(Clip ends.)	01:58PM
11	Q. (BY MS. WRIGLEY) We'll look at the next clip,	01:58PM
12	616, from the same War Room podcast.	01:58PM
13	A. Let it be known, I didn't say Smartmatic there.	01:58PM
14	Did you catch that? Just for kicks.	01:58PM
15	(Clip of Steve Bannon and Mike Lindell.)	01:58PM
16	MR. LINDELL: Everything you were bringing	01:58PM
17	up before, you know, when you were going, oh, there was,	01:58PM
18	you know, dead people voting and there was nonresidents	01:58PM
19	voting, I mean, you should -- Donald Trump should have	01:58PM
20	been put back in just for that alone. All these	01:58PM
21	nonresidents that voted, all the cheating. I call that	01:58PM
22	organic cheating.	01:58PM
23	What I'm calling here is what they -- what	01:58PM
24	foreign countries like China came in and attacked our	01:58PM
25	country using these machines, Dominion, Smartmatic,	01:58PM

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1 ES&S, all these machines.

01:58PM

2 Now, I want to ask everybody something
 3 here. You know, you say, well, can the Supreme Court --
 4 well, look. They've never seen this before, so they
 5 can't turn down something they never seen. This is the
 6 evidence -- this is the smoking gun evidence.

01:59PM

02:00PM

7 But I wanted -- I want to put a -- ask
 8 everybody out there this: You know, ask yourself if
 9 MyPillow -- if everybody out there said there were rocks
 10 and knives in MyPillow's, you know what I would do,
 11 being a -- maybe a smart kind of business owner and
 12 businessman, I'd say, hey, guys, everybody come and
 13 look. There's no knives or rocks. Hello. Okay?

01:59PM

02:00PM

20 STEVE BANNON: We're going to run out of
 21 time.

01:59PM

01:59PM

01:59PM

01:59PM

01:59PM

02:00PM

22 MR. LINDELL: -- there's over 200 threats
 23 and lawsuits from Dominion, Smartmatic and the other
 24 machine people.

01:59PM

01:59PM

01:59PM

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1 easier and say, hey, guys, look inside the machine. 02:00PM
2 There's nothing to hide. 02:00PM
3 (Clip ends.) 02:00PM
4 Q. (BY MS. WRIGLEY) Now, looking at that 02:00PM
5 Exhibit 616, Mr. Lindell, did you recognize yourself? 02:00PM
6 A. Oh, yeah. 02:00PM
7 Q. And that was you on -- with Mr. Steve Bannon, 02:00PM
8 correct? 02:00PM
9 A. Yeah. Yeah. 02:00PM
10 Q. And in that one, you specifically mentioned 02:00PM
11 Smartmatic, right? 02:00PM
12 A. Right. Right. Right. 02:00PM
13 Q. And you had said Smartmatic, along with 02:00PM
14 Dominion and ES&S, were involved in trying to -- 02:00PM
15 A. Right. Why didn't they just show their cards, 02:00PM
16 right? Exactly. I said, why wouldn't they just show -- 02:00PM
17 show us their side. Tell them, hey, show it if there's 02:00PM
18 nothing to hide. These are government companies. 02:00PM
19 They're not private companies. They work for us. 02:00PM
20 Q. And you had indicated Smartmatic was involved 02:00PM
21 in a crime or attack against the country? 02:00PM
22 A. They were -- they were -- yes. And Smartmatic, 02:00PM
23 all the machine companies, yes. This is what happened, 02:00PM
24 show us the data. 02:00PM
25 Q. And you were discussing on this appearance with 02:00PM